

TD365 KYC Procedures

Before TradeDirect365 ('TD365'), a trading name of Finsa Pty Ltd, can approve an application it must have verified the identity of the applicant, otherwise known as completing Know Your Customer (KYC). Section 4.2.7 of the AML/CTF Rules requires that client information must be verified based on "reliable and independent documentation", "reliable and independent electronic data" or "a combination of both".

The level of KYC we perform on each applicant is dependent on the risk profile of that client. The risk profile is assessed using 4 parameters:

1. Country of origin of the client
2. The type of client
3. The type of service provided
4. The methods by which the service is delivered

The type of service we provide (3) is set as the Financial Services under our AFSL (422661). The method by which we deliver this service (4) is currently set as we only settle through a domestic registered bank, Westpac. For retail clients the type of client (2) is set, which leaves Country of origin (1) as the means by which we determine the level of KYC that is needed.

The Country of origin risk level is ascertained with reference to the FATF guidelines and reconsidered on a quarterly basis in line with FATF's quarterly reports. Please call our customer service department for further information on the risk status of your country of residence if required: 1800 886 514 (press "2") or +61 (0)2 8310 4713 (from outside Australia).

The document requirements per risk category are as follows:

Low Risk

One item from **List A** to verify photographic identity against date of birth and a document to verify name against current residential address. If the document provided from **List A** details both date of birth and address, it will be sufficient. If not, a separate document is required from either **List A or B**. A scanned coloured copy or a photo taken by a smartphone will be acceptable.

Medium Risk

One item from **List A** to verify photographic identity against date of birth and another item from either **List A or B**, at least one of which verifies the current residential address, as entered on the account application. A scanned coloured copy or a photo taken by a smartphone will be acceptable.

High Risk

One item from **List A** to verify identity; **one item** from either **List A or B**, at least one of which verifies the current residential address, as entered on the account application; and **a bank statement**, dated within the last 3 months. A scanned copy or a photo taken by a smartphone of the documents will be acceptable.

Acceptable documents are as follows:

List A - all of which must not have expired

- Passport
- Driver's Licence
- National Identity Card
- Other Government issued photo ID

List B - dated within the last three months

- Utility Bill- this cannot be a mobile phone bill or a bill or printed from the internet
- Notice of assessment issued by the taxation authority.
- Other documentary proof of address issued by a public body, including local council.
- Bank or Credit Card statement - not printed from the internet.

All the above documents need to be dated within the past 3 months. In the case where the original document is in an electronic format, we accept the electronic version as the original. We cannot accept screenshots of an online account for verification processes.

Applicants with PO BOX addresses

If an applicant has entered a PO Box address on the application form, we need to ascertain the underlying residential address by receiving one of the following:

- A certified copy of the agreement with the Post Office, showing both the residential address and PO Box address.
- Or a utility bill showing both the residential address and the PO Box address.
- Or in a case where the accommodation is provided by an employer, we need to be provided with a letter confirming employment, residential address and the link to the PO Box.

Certification of documents

High-risk country applicants need to have documents signed and dated by a recognised certifier who can be one of the following:

- Lawyer
- Accountant
- Notary public
- Bank manager
- Certified translator

The certifier must be actively pursuing one of these professions and not be retired or be a family member of the applicant.

Additionally, if either proof of ID or proof of address is printed in language other than English, then a translated transcription of the document will need to be signed by a certified translator and provided with the document.